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July 8, 2020

VIA ECF

Hon. I. Leo Glasser
Senior United States District Judge
for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Kashmir Gill v. JUS Punjabi Broadcasting Corp., et al.
Case No. 1:19-cv-04216 (ILG) (PK)

Dear Judge Glasser:

I represent all defendants in the above-entitled action.

In accordance with Your Honor's Individual Practice Rules, I am writing to advise the Court that it is my intention to move, on behalf of my clients, for orders (i) pursuant to Fed. R. Civ. P. 56, dismissing the complaint and (ii) pursuant to Fed. R. Civ. P. 12(c), for judgment on the pleadings dismissing the complaint.

I respectfully request the following briefing schedule:

Date for filing of motion – July 31, 2020

Date for filing of opposition – August 31, 2020

Date for filing of reply – September 15, 2020

* * *

I have several times requested that Alan R. Ackerman, a New Jersey attorney admitted *pro hac vice* to represent plaintiff Kashmir Gill, consent to this schedule. Mr. Ackerman has not yet responded to my request. Since I have several times by email requested his consent, I am, by copy of this letter, requesting that he consent to this schedule.

Respectfully submitted,



Paul Batista

cc: Alan R. Ackerman
(VIA ECF)